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Attorneys for Defendant Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF CARL SPILLY IN
SUPPORT OF DEFENDANT GOOGLE
LLC'S REPLY IN SUPPORT OF MOTION
TO EXCLUDE PLAINTIFFS' LATE
DISCLOSED AND IRRELEVANT
WITNESS BLAKE LEMOINE (DKT. 1015)**

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: January 29, 2024

1 I, Carl Spilly, declare as follows:

2 1. I am a member of the bar of the District of Columbia and an attorney for Quinn
3 Emanuel Urquhart & Sullivan, LLP, which serves as Google's outside counsel in this litigation. I
4 have been admitted pro hac vice in this matter. (Dkt. 161). I make this declaration of my own
5 personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify
6 competently thereto.

7 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google's
8 Reply in Support of Motion to Exclude Plaintiffs' Late Disclosed and Irrelevant Witness Blake
9 Lemoine ("Google's Reply"). In making this request, Google has carefully considered the relevant
10 legal standard and policy considerations outlined in Civil Local Rule 79-5. Google makes this
11 request with the good faith belief that the information sought to be sealed consists of highly sensitive
12 personnel information regarding a non-party former Google employee.

13 3. I have reviewed Google's Reply, and based on my review, there is good cause to seal
14 the following information:

Document(s) to be Sealed	Basis for Sealing
Google's Reply in Support of Motion to Exclude Plaintiffs' Late Disclosed and Irrelevant Witness Blake Lemoine (Dkt. 1015) at: 5:12-19	Contains Material Satisfying Rule 26(c) Standard pursuant to the Protective Order.

20 4. The information sought to be sealed is narrowly tailored to seek sealing only of
21 highly sensitive personnel information regarding a non-party former employee, and Google does
22 not otherwise request sealing any other information.

23 5. Google does not seek to redact or file under seal any of the remaining portions of
24 documents not indicated in the table above.

25 6. For these reasons, Google respectfully requests that the Court order Google's Reply
26 to be filed under seal.
27
28

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct.

3 Executed in Washington, D.C. on November 1, 2023.

4 By /s/ Carl Spilly
5 Carl Spilly
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